

METHFESSEL & WERBEL, ESQS.  
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Attorneys for Coastal Title Agency  
Our File No. 45987 MRM

WALSH SECURITIES, INC.

Plaintiff,

V.

CRISTO PROPERTY MANAGEMENT,  
LTD., A/K/A G.J.L. LIMITED, DEK  
HOMES OF NEW JERSEY, INC.,  
OAKWOOD PROPERTIES, INC.,  
NATIONAL HOME FUNDING, INC.,  
CAPITAL ASSETS PROPERTY  
MANAGEMENT & INVESTMENT CO.,  
INC., CAPITAL ASSETS PROPERTY  
MANAGEMENT, L.L.C., WILLIAM J.  
KANE, GARY GRIESER, ROBERT  
SKOWRENSKI, II, RICHARD CALLANI,  
RICHARD DIBENEDETTO, JAMES R.  
BROWN, THOMAS BRODO, RONALD  
J. PIERSON, STANLEY YACKER, ESQ.,  
MICHAEL ALFIERI, ESQ., RICHARD  
PEPSNY, ESQ., ANTHONY M.  
CICALESE, ESQ., LAWRENCE M.  
CUZZI, ANTHONY D'APOLITO, DAP  
CONSULTING, INC.,  
COMMONWEALTH LAND TITLE  
INSURANCE COMPANY, NATIONS  
TITLE INSURANCE COMPANY OF  
NEW YORK, INC., FIDELITY  
NATIONAL TITLE INSURANCE  
COMPANY OF NEW YORK, COASTAL  
TITLE AGENCY AND STEWART TITLE  
GUARANTY COMPANY, IRENE DIFEO,  
DONNA PEPSNY, WEICHERT  
REALTORS, AND VECCHIO REALTY,  
INC. D/B/A MURPHY REALTY  
BETTER HOMES AND GARDENS,

Defendants.

UNITED STATES DISTRICT - NEWARK  
: CV 97-3496 (WGB)

Civil Action

**DEFENDANT COASTAL TITLE  
AGENCY'S FIRST SET OF  
INTERROGATORIES**

Defendant Coastal Title Agency, by its attorneys, Methfessel & Werbel, Esqs., requests the parties identified in the title of this document give certified answers to the following Interrogatories based upon knowledge and information available to them and their agents and attorneys as required by the Federal Rules of Civil Procedure.

**METHFESSEL & WERBEL, ESQS.**  
Attorneys for Coastal Title Agency



By: \_\_\_\_\_

Martin R. McGowan

Dated: June 7, 2005

1. Set forth each and every fact (not legal conclusion) that supports any cross claims or other claims you make against the party serving these Interrogatories.
2. Identify each and every document that supports your answer to the immediately preceding Interrogatory.
3. Set forth each and every fact (not legal conclusion) that supports any cross claims or other claims you make against any other party to this lawsuit.
4. Identify each and every document that supports your answer to the immediately preceding Interrogatory.
5. If you contend that any party made any admissions, set forth in detail each and every admission, including the date it was made and the person making the admission.
6. Identify any and all documents that you contend are admissions.
7. Set forth each and every declaration against interest that you contend was made by any party or any witness, including the date it was made and the identity of the person making the declaration.
8. Identify any and all documents that you contend are declarations against interest.
9. Set forth each and every fact (not legal conclusion) that supports any affirmative or separate defenses pled by you.
10. Identify each and every document that supports our answer to the immediately preceding Interrogatory.